RO-5

Richard Gunderson, Treasurer
American Council of Life Insurance,
Life Insurance PAC
1001 Pennsylvania Avenue NW
Washington, DC 20004

MAY 1 2 1995

Identification Number: C00147066

Reference: Year End Report (11/29/94-12/31/94)

Dear Mr. Gunderson:

!1)

 $^{\circ 4}$

: N.

2

Э

ο.

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(d) preclude a committee from receiving contributions from another political committee or person in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeded the limits, you must seek reattribution of the contribution pursuant to 11 CFR \$110.1(k), transfer-out the amount in excess of \$5,000 to an account not used to influence federal elections or refund the excessive amount to the donor(s) in accordance with 11 CFR \$103.3(b). In the best interest of your committee, all reattributions, transfers—out, and refunds should be made within sixty days of the treasurer's receipt of the contribution(s). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of granting written authorization for a reattribution or transfer—out to another account or receiving a refund.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your

Celebrating the Commission's 20th Annierosay.

check for the transfer-out or refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution, transfer-out or refund the excessive amount will be taken into consideration.

Any amendment or clarification should be filed with the Pederal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Edward D. Ryan

Reports Analyst
Reports Analysis Division

209

W)

 $^{\circ}$

10

Š

·•

111

15%

Itemized Contributions

Page 6 of 7 for Line 11a

American Council of Life Insurance PAC

1	EMPLOYER	DATE	AMOUNT
¿ L. Pruitt	American Council of Life Insurance	12/30/94	40.
: Pennsylvania Ave. NW : ington DC 20004	OCCUPATION		
AGGREGA	TE TO DATE: 480.		
,	EMPLOYER	DATE	AMOUNT
A. Reardon	American Council of Life Insurance	12/30/94	32.
1 - Pennsylvania Ave. NW	OCCUPATION Director TO DATE: 384.		
\$2	EMPLOYER	DATE	AMOUNT
Schweiker	American Council of Life Insurance	12/30/94	464.
Nashington DC 20004	OCCUPATION President TE TO DATE: 5568.		EDR.
>. 3⊾ :	EMPLOYER	DATE	THUOMA
hony T. Spano	American Council of Life Insurance	12/30/94	50.
1. 1 Pennsylvania Ave. NW Swashington DC 20004 AGGREGA	OCCUPATION ACTUARY TE TO DATE: 600,		
NrZ	EMPLOYER	DATE	AMOUNT
Phillip E. Stano	American Council of Life Insurance	12/30/94	20.
1001 Pennsylvania Ave. NW Washington DC 20004	OCCUPATION Senior Counsel		

AGGREGATE TO DATE: 240.

Itemized Contributions

Page 6 of 10 for Line 11a

American Council of Life Insurance PAC

name	EMPLOYER	DATE	AMOUNT
Paul A. Reardon 1001 Pennsylvania Ave. NW Washington DC 20004 AGGREGAT	American Council of Life Insurance OCCUPATION Director TO DATE: 352.	10/31/94 11/28/94	32. 32.
NAME	EMPLOYER	DATE	ANOUNT
\ '	American Council of Life Insurance OCCUPATION President E TO DATE: 5104.	10/31/94 11/28/94	464.
. Э.	EMPLOYER	DATE	AMOUNT
Menthony T. Spano 1001 Pennsylvania Ave. NW Washington DC 20004 AGGREGAT	American Council of Life Insurance OCCUPATION Actuary B TO DATE: 550.	10/31/94 11/28/94	50. 50.
NO NAME	EMPLOYER	DATE	AMOUNT
Phillip E. Steno 1001 Pennsylvania Ave. NW Washington DC 20004 AGGREGAT	American Council of Life Insurance OCCUPATION Senior Counsel TO DATE: 220.	10/31/94 11/28/94	20. 20.
NAME	employer	DATE	AMOUNT
Charles Wollerton 1001 Pennsylvania Ava. NW Washington DC 20004 AGGREGAT	American Council of Life Insurance OCCUPATION TO DATE: 440.	10/31/94 11/28/94	40. 40.

o.